

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE J. KONCELIK, JR.,)	
)	
Plaintiff,)	Civil Action No. 1:08-cv-623
)	
v.)	Honorable Elaine E. Bucklo
)	Honorable Magistrate Nan R. Nolan
SUNBEAM PRODUCTS, INC.)	
d/b/a JARDEN CONSUMER)	
SOLUTIONS.)	

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

COME NOW, the parties, by and through their respective undersigned counsel, and jointly move the Court to enter the attached Stipulated Protective Order. In support of this Motion, the parties state as follows:

1. Counsel for the parties have consulted, agreed and stipulated upon certain terms that should be applicable to and govern certain discovery taken pursuant to the Federal Rules of Civil Procedure.
2. The agreed terms are set forth in the Stipulated Protective Order attached hereto as Exhibit 1.
3. The parties jointly request the Court to enter the Stipulated Protective Order.

Respectfully submitted,

HUSCH BLACKWELL SANDERS LLP

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Attorney for Plaintiff Lawrence Koncelik, Jr.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 28th day of July, 2008, the foregoing was served by operation of the Court's electronic filing system upon all counsel of record in this cause.

/s/Michael R. Annis